

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**THOMAS TAYLOR,**

**Plaintiff,**

**vs.**

**SCHOOL OF THE WOODS**

**Defendant,**

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**NO. 4:23 –cv-00843**

**JURY DEMANDED**

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**PLAINTIFF’S EXPERT WITNESS DESIGNATION**

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Plaintiff Thomas Taylor files this Expert Witness Designation in the above-referenced matter. Since discovery is ongoing, Plaintiff reserves the right and intends to supplement these designations.

1. Ronald E. Dupree, Jr.  
DUPREE LAW FIRM, PLLC  
2800 Post Oak Blvd, Suite 4100  
Houston, Texas 77056  
(832) 800-4529

Mr. Dupree may offer expert opinion testimony regarding the reasonableness, necessity, and amount of attorneys’ fees incurred by Plaintiff and Plaintiff’s entitlement to these fees under the law. Mr. Dupree may also offer rebuttal testimony to any expert(s) designated by Defendant concerning attorneys’ fees. Generally, this

expert will testify that because of Defendant's actions, Plaintiff was required to retain legal counsel and has incurred, and continues to incur fees, and is entitled under the law to recovery of the reasonable and necessary expenses and fees for the services of his legal counsel.

Mr. Dupree's findings, conclusions, opinions, and testimony will be based upon his background, knowledge, experience, and the time expended on the case, the novelty and difficulty of the questions involved in the case, and any other relevant factors as defined by law. Mr. Dupree may also base his opinion on all available billing information, as well as the pleadings, discovery and other documents on file or produced in the case.

Information concerning Mr. Dupree's qualifications can be found at [www.dupreelawfirm.com/about](http://www.dupreelawfirm.com/about). Time spent testifying will be paid at the hourly rate set by the Court.

#### **GENERAL PROVISIONS**

Plaintiff reserves the right to amend and/or supplement this designation with additional designations of experts, if necessary, within the time limits imposed by the Court or any alterations of same by subsequent Order or agreement of the parties, or pursuant to the Federal Rules of Civil Procedure and/or Rules of Evidence.

Plaintiff reserves the right to withdraw the designation of any expert and to aver positively that any such previously designated expert will not be called as a

witness at the trial of this matter, and to designate again same as a consulting expert, who cannot be called by opposing counsel. Plaintiff may elicit expert testimony from any and all experts or representatives who have been, or may be, designated by or called by Defendants and who the Court allows to testify. This is not a designation of any expert identified by the Defendants who is de-designated or otherwise not permitted to testify.

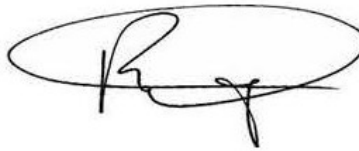
Plaintiff may call to testify as expert witnesses any and all parties to this lawsuit, or employees, agents, or representatives of such parties. This specifically includes, but is not limited to, all personnel of all the parties, and others who have given or may give depositions or who have been identified in the discovery or documents produced or to be produced in this litigation. In addition, any fact witnesses designated by Defendants may offer expert opinions regarding matters within their knowledge. Plaintiff reserves the right to call undesignated rebuttal experts whose testimony cannot reasonably be foreseen until the presentation of the evidence.

This designation shall serve to supplement Plaintiff's initial disclosures or any other applicable discovery requests. For each person or entity designated herein, Plaintiff also designates the custodian of records to the extent necessary to make this designation complete.

Plaintiff reserves whatever additional rights he may have with regard to experts, pursuant to the Federal Rules of Civil Procedure and Rules of Evidence, the case law construing same, and rulings of the Court.

Respectfully Submitted,

**DUPREE LAW FIRM, PLLC**

A handwritten signature in black ink, appearing to be 'R. Dupree', enclosed within a large, hand-drawn oval.

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Ronald Dupree

Texas Bar No. 24055433

Southern District No. 1046738

2800 Post Oak Blvd., Suite 4100

Houston Texas 77056

Main: 832-800-4529

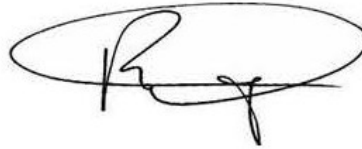
Fax: 281-503-7905

Email: [Ronald@dupreelawfirm.com](mailto:Ronald@dupreelawfirm.com)

**ATTORNEY-IN-CHARGE FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that on July 31, 2023, a true and correct copy of Plaintiff Thomas Taylor's Expert Witness Designation was e-filed with the Court and served on all Parties using the Court's CM/ECF system.

A handwritten signature in black ink, appearing to read 'R. Dupree', is enclosed within a large, hand-drawn oval.

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Ronald Dupree